

UNITED STATES DISTRICT COURT  
for the  
Eastern District of Michigan

United States of America

v.

Jaquan Jones

Case: 2:23-mj-30493

Assigned To : Unassigned

Assign. Date : 12/18/2023

CMP: USA v JONES (MAW)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 29, 2023 & December 13, 2023 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

18 U.S.C. § 922(g)(1)

Felon in possession of a firearm

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: December 18, 2023City and state: Detroit, MI*Complainant's signature*Kenton Weston, Special Agent ATF*Printed name and title**Judge's signature*Hon. Elizabeth A. Stafford, U.S. Magistrate Judge*Printed name and title*

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST  
WARRANT**

I, Kenton Weston, being first duly sworn, hereby state:

**INTRODUCTION**

1. I have been employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), assigned to the Detroit Field Division since January 2018. I graduated from the ATF Privately Made Firearm (PMF) and Machine Gun Conversion (MCD) Train the Trainer Course, Criminal Investigator Training Program, and the ATF Special Agent Basic Training Program. During my employment with ATF, I have conducted and/or participated in several dozens of criminal investigations focused on firearms, drug trafficking violations, and criminal street gangs in the Eastern District of Michigan.

2. I am currently assigned to the Pontiac Gun Violence Task Force (GVTF), a task force established by the Oakland County Sheriff's Office (OCSO) and ATF. The GVTF is tasked with investigating the unlawful possession of firearms and violent firearm crimes committed within the city of Pontiac and or the Eastern District of Michigan. During my employment with ATF, I have been involved in over a hundred investigations involving violent crimes, which have resulted in the seizure of illicit controlled substances, hundreds of firearms, and over one hundred arrests.

3. This affidavit is made in support of an application for a criminal

complaint for Jaquan Elathen JONES(XX/XX/1995).

4. I have probable cause to believe that JONES, who knew he was a convicted felon, knowingly possessed firearms, which traveled in interstate commerce, in violation of 18 U.S.C. § 922(g)(1).

5. I make this affidavit based on my participation in this investigation, reports from other law enforcement agents, communications with others who have personal knowledge of the events and circumstances described herein, and information gained through my training and experience.

6. The information in this affidavit is for the limited purpose of establishing probable cause and does not contain all details or all facts relating to this investigation.

### **PROBABLE CAUSE**

7. On November 29, 2023, members of the Detroit Police Department (DPD) 2<sup>nd</sup> Precinct walked into a business located in the Eastern District of Michigan, specifically, Village Liquor located at 14241 W McNichols Detroit, MI. The officers observed a male wearing a black North face coat with fur around the hood in the liquor store, later identified as JONES. As JONES exited the business, he looked in the direction of an officer and did a weapon retention check, by tapping his right hip, and then began to walk slower towards the front exit. As JONES was exiting the store and past the officers, JONES was observed to have

the front right side of his pants hanging lower than the left, as if there was a heavy object in his pants, and avoided looking at the officers by keeping his head down.

One of the DPD officers asked JONES, if he has a Concealed Pistol License.

While using his right arm to cover his right hip and continuing to look down,

JONES stated "No" and ran on foot toward a parked 2017 silver Chevy Malibu (MI plate ending in 1244). DPD officers pursued JONES on foot. While outside,

JONES slipped and fell to the ground hitting his face on the Malibu causing

injuries to his face. While JONES was on the ground, DPD officers attempted to

detain JONES. JONES began resisting by keeping his arms under his body, while

being non-compliant DPD officers identified that JONES was in possession of a

black Glock 45 9mm pistol. JONES slid the gun away from his body. As DPD

officers continued to attempt to handcuff JONES and secure the Glock, a male

associate of JONES who was inside the silver Malibu began to draw the attention

of the DPD officers. Subsequently, while JONES was not complying with the

officers, the associate began grabbing the officers by their ballistic vest and pulling

them off of JONES. This interference resulted in JONES successfully fleeing the

scene. Prior to leaving the scene, a DPD officer who attempted to arrest JONES

confirmed the identity of JONES. An arrest warrant was issued for JONES.

JONES's Glock, 9mm pistol was recovered and taken as evidence.

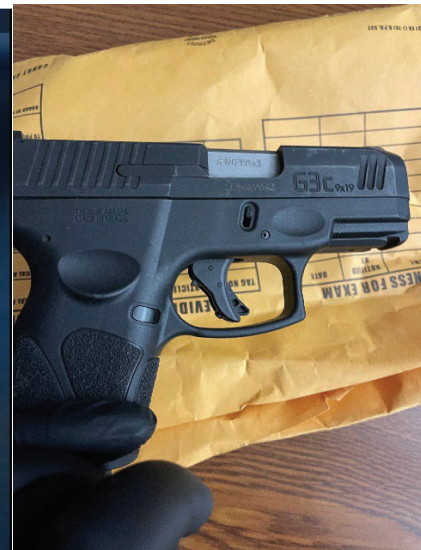
8. On December 13, 2023, members of DPD 2<sup>nd</sup> Precinct were executing an arrest operation for JONES, and conducting fixed surveillance in the area of W. Chicago/ Freeland in Detroit, MI. DPD officers identified a 2017 gray Chevrolet Malibu (MI plate ending in 4715) that was associated with JONES. DPD officers saw an unidentified individual that appeared to be sleeping underneath a blanket in the passenger compartment. At approximately 1:10 pm, T.R. entered the vehicle through the driver's side and departed. Moments later, DPD executed a traffic stop of the 2017 Malibu. T.R. stopped the vehicle. As DPD approached, they identified JONES seated in the front passenger seat. DPD officers called out that JONES was making furtive motions underneath the passenger seat. DPD officers gave multiple commands to T.R. and JONES to show the officers their hands and to open the door but these commands were ignored. Suddenly, JONES sat on T.R. in the driver's seat and fled the scene. Moments later, the Malibu stopped, officers approached the vehicle and noticed T.R. removed herself from the driver's seat underneath JONES, and she moved to the back seat. JONES remained in the driver's seat and he fled the scene. For approximately 13 minutes, JONES led police on a highspeed chase that resulted in a traffic crash with oncoming traffic, where the driver side of the 2017 Malibu was impacted. Immediately after, DPD officers pulled T.R. and JONES out of the passenger side of the vehicle. During an inventory search of the vehicle, a loaded Tarus G3c 9mm pistol, to include one

chambered round (see Image 2), was recovered from underneath the passenger seat (see the red circle in Image 1 below). A search of the Law Enforcement Information Network (LEIN) revealed the firearm, was reported stolen in September of 2023. I spoke with T.R. at the crash scene. She explained that she is not prohibited from having a firearm and the first time she had observed the firearm was when DPD officers recovered it from the car.

Image 1



Image 2



9. On December 17, 2023, I reviewed surveillance footage maintained by Village Liquor and observed the individual who was wearing a black North face coat with fur around the hood, the same individual the DPD officer identified as JONES (see Image 3). Additionally, I reviewed and compared the footage captured by DPD's Body Worn Camera (BWC) of JONES' arrest (see Image 4) to the surveillance footage. Based on the size of the individual, shape, skin tone, cheek



structure, hair style, and from my personal interaction with JONES, I recognized the individual in the surveillance footage to be JONES.

Image 3



Image 4



10. On December 14, 2023, I contacted Special Agent Kara Klupacs, an ATF Interstate Nexus Expert, and provided her a description of the firearms recovered. Based upon the description, Special Agent Klupacs advised that both guns are firearms as defined under 18 U.S.C. § 921. She also advised that the firearms were manufactured outside of the state of Michigan after 1898 and therefore had traveled in and affected interstate commerce.

11. I reviewed JONES' computerized criminal history which revealed the following convictions.

- a. On August 22, 2017, pled guilty in Michigan's 18<sup>th</sup> District Court to an ordinance violation of domestic violence.
- b. On October 24, 2019, pled guilty to a May 7, 2018 arrest, in Michigan's 3<sup>rd</sup> Circuit Court to felony police officer- fleeing fourth degree.
- c. On October 24, 2019, pled guilty to an August 28, 2019 arrest, in Michigan's 3<sup>rd</sup> Circuit Court to felony larceny from the person and misdemeanor domestic violence and /or knowingly assaulting a pregnant individual 2<sup>nd</sup> offense notice.

**CONCLUSION**

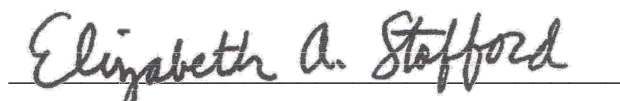
12. There is probable cause to believe that on November 29, 2023 and December 13, 2023, within the Eastern District of Michigan, Jaquan JONES, who knew he was a convicted felon, knowingly possessed firearms, which had traveled in interstate commerce, in violation of 18 U.S.C. § 922(g)(1).

Respectfully submitted,



Kenton Weston, Special Agent  
Bureau of Alcohol, Tobacco,  
Firearms and Explosives

Sworn to before me and signed in my  
presence and/or by reliable electronic means



Hon. Elizabeth A. Stafford  
United States Magistrate Judge

Dated: December 18, 2023